



Verizon Wireless
1300 I Street, N.W.
Suite 400 West
Washington, DC 20005

Phone 202 589-3740
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February 27, 2009

VIA ECFS

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th St., SW
Suite TW-A235
Washington, DC 20554

Re: *Annual CPNI Certification, EB Docket No. 06-36*

Dear Ms. Dortch:

Pursuant to Section 64.2009(e) of the Commission's rules, 47 C.F.R. § 64.2009(e), Rural Cellular Corporation (RCC) hereby files its annual certification of compliance with the Commission's customer proprietary network information (CPNI) rules. As a result of a merger that was consummated on August 7, 2008, Rural Cellular Corporation became a wholly-owned subsidiary of Cellco Partnership d/b/a Verizon Wireless. For calendar year 2008, therefore, RCC is submitting two CPNI certifications, one covering the period January 1 – August 7, 2008 and a second covering August 7 – December 31, 2008.

Please contact the undersigned at (202) 589-3770 should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Tamara L. Preiss".

Tamara L. Preiss

cc: Best Copy and Printing, Inc. (via e-mail)

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket No. 06-36

Annual 47 C.F.R. § 64.2009(e) CPNI Certification for the period from January 1, 2008 until 12:01 a.m. August 7, 2008

Company Name: Rural Cellular Corporation
3905 Dakota Street SW
Alexandria, Minnesota 56308
Form 499 Filer ID: 815018

Subsidiaries: RCC Atlantic Licenses, LLC
FRN 0003715935

RCC Atlantic, Inc.
Form 499 Filer ID: 817680

RCC Atlantic Long Distance, Inc.
Form 499 Filer ID: 817682

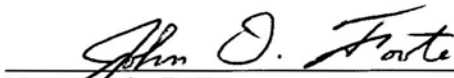
RCC Minnesota, Inc.
FRN 0002622934

TLA Spectrum, LLC
FRN 0002622447

Wireless Alliance, LLC
Form 499 Filer ID: 815019

I, John Foote, hereby certify that I was an officer of the company named above for the period covered by this certification and am currently an employee of Verizon Wireless as a result of the Verizon Wireless – RCC merger that was consummated on August 7, 2008. In that capacity, I have personal knowledge that this company and its subsidiaries established operating procedures adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001-2011.

Attached to this certification is a statement that (i) explains how the company's procedures ensured that the company complied with the requirements set forth in 47 C.F.R. §§ 64.2001-2011, (ii) explains any actions taken against data brokers during the period covered by this certification, (iii) summarizes all customer complaints received in the period covered by this certification concerning the unauthorized release of CPNI, and (iv) reports information known to the company regarding tactics pretexters may be using to attempt access to CPNI.



Name: John D. Foote
Title: Former Vice President, Customer Operations
Rural Cellular Corporation
Date: February 24, 2009

Statement for the period from January 1, 2008 until 12:01 a.m. August 7, 2008

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket No. 06-36

Company Name: Rural Cellular Corporation
3905 Dakota Street SW
Alexandria, Minnesota 56308

Subsidiaries: RCC Atlantic Licenses, LLC
RCC Atlantic, Inc.
RCC Atlantic Long Distance, Inc.
RCC Minnesota, Inc.
TLA Spectrum, LLC
Wireless Alliance, LLC

1. Rural Cellular Corporation and its subsidiaries ("Company") established operating procedures that ensured compliance with the Federal Communications Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI"), including the following:

- Company implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Company continually educated and trained its employees regarding the appropriate use of CPNI. Company established disciplinary procedures should an employee violate the CPNI procedures established by Company.
- Company maintained a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Company also maintained a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Company established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintained records of Company compliance for a minimum period of one year. Specifically, Company's sales personnel obtained supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensured that opt-out elections are recorded and followed.
- Company implemented procedures to properly authenticate customers prior to disclosing CPNI over the telephone, at Company's retail locations or otherwise, and, in connection with these procedures, Company established a system of passwords and back-up authentication methods which complied with the requirements of applicable Commission rules.
- Company established procedures to ensure that customers are immediately notified of account changes including changes to passwords, back-up means of authentication for lost or forgotten passwords, or address of record.

2. Company did not take any actions against data brokers during the period covered by this statement, including proceedings instituted or petitions filed by Company at a state commission, in the court system, or at the Commission.

3. The Company did not receive any customer complaints during the period covered by this statement related to unauthorized release of CPNI.

4. Company has no information with respect to processes used by pretexters to attempt to access CPNI other than that which is generally and publicly known, and Company has implemented customer authentication procedures including those described in item 1 above to address pretexter tactics of which it is aware.

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket No. 06-36

Annual 47 C.F.R. § 64.2009(e) CPNI Certification for the period from 12:01 a.m. August 7, 2008 through December 31, 2008

Company Name: Rural Cellular Corporation
3905 Dakota Street SW
Alexandria, Minnesota 56308
Form 499 Filer ID: 815018

Subsidiaries: RCC Atlantic Licenses, LLC
FRN 0003715935

RCC Atlantic, Inc.
Form 499 Filer ID: 817680

RCC Atlantic Long Distance, Inc.
Form 499 Filer ID: 817682

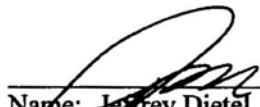
RCC Minnesota, Inc.
FRN 0002622934

TLA Spectrum, LLC
FRN 0002622447

Wireless Alliance, LLC
Form 499 Filer ID: 815019

I, Jeffrey Dietel, hereby certify that I have been an officer of the company named above for the period covered by this certification. In that capacity, I have personal knowledge that this company and its subsidiaries have established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001-2011.

Attached to this certification is a statement that (i) explains how the company's procedures ensure that the company is in compliance with the requirements set forth in 47 C.F.R. §§ 64.2001-2011, (ii) explains any actions taken against data brokers during the period covered by this certification, (iii) summarizes all customer complaints received in the period covered by this certification concerning the unauthorized release of CPNI and (iv) reports information known to the company regarding tactics pretexters may be using to attempt access to CPNI.


Name: Jeffrey Dietel
Title: Staff Vice President -- Marketing
Date: February 27, 2009

Statement for the period from 12:01 a.m. August 7, 2008 through December 31, 2008

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket No. 06-36

Company Name: Rural Cellular Corporation
3905 Dakota Street SW
Alexandria, Minnesota 56308

Subsidiaries: RCC Atlantic Licenses, LLC
RCC Atlantic, Inc.
RCC Atlantic Long Distance, Inc.
RCC Minnesota, Inc.
TLA Spectrum, LLC
Wireless Alliance, LLC

1. Rural Cellular Corporation and its subsidiaries ("Company") have established operating procedures that ensure compliance with the Federal Communications Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI"), including the following:

- Company has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Company continually educates and trains its employees regarding the appropriate use of CPNI. Company has established disciplinary procedures should an employee violate the CPNI procedures established by Company.
- Company maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Company also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Company has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of Company compliance for a minimum period of one year. Specifically, Company's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.
- Company has implemented procedures to properly authenticate customers prior to disclosing CPNI over the telephone, at Company's retail locations or otherwise, and, in connection with these procedures, Company has established a system of passwords and back-up authentication methods which complies with the requirements of applicable Commission rules.
- Company has established procedures to ensure that customers are immediately notified of account changes including changes to passwords, back-up means of authentication for lost or forgotten passwords, or address of record.

2. Company did not take any actions against data brokers during the period covered by this statement, including proceedings instituted or petitions filed by Company at a state commission, in the court system, or at the Commission.

3. The Company did not receive any customer complaints during the period covered by this statement related to unauthorized release of CPNI.

4. Company has no information with respect to processes used by pretexters to attempt to access CPNI other than that which is generally and publicly known, and Company has implemented customer authentication procedures including those described in item 1 above to address pretexter tactics of which it is aware.